

Remarks

This Application has been carefully reviewed in light of the Final Office Action mailed October 12, 2007. Applicants believe all pending claims are allowable without amendment and respectfully provide the following remarks. Applicants respectfully request reconsideration and allowance of all pending claims.

I. The Claims are Allowable over the Section 103 Rejections

A. Independent Claims 27, 42, and 57 and Their Dependent Claims are Allowable over the Proposed *Touboul-Hayman* Combination

Claims 27-32, 34, 42-47, 49, 57-62, and 64 are rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent 6,092,194 to Touboul ("*Touboul*") in view of U.S. Patent 5,859,966 to Hayman et al. ("*Hayman*"). Applicants respectfully traverse these rejections and discuss independent Claim 27 as an example.

The proposed *Touboul-Hayman* combination fails to disclose, teach, or suggest at least the following limitations recited in Claim 27:

- providing, on a workstation, a pre-set list of applications permitted to run on the workstation and a list of one or more computer resources on the workstation that are not accessible to unspecified applications;
- receiving at the filter a request for access generated by an unspecified application downloaded to the workstation from a source external to the workstation, the request for access identifying a computer resource resident on the workstation to which the unspecified application seeks access; and
- determining, by the filter on the workstation, whether the requested computer resource is on the list of one or more computer resources that are not accessible to unspecified applications.

The Examiner apparently alleges that *Touboul* discloses these limitations. (*See* Final Office Action at 4-5)

The Examiner apparently maintains that the internal network security system 110 of *Touboul* is a workstation having these claim limitations. (Final Office Action at 2-3) The Examiner equates the non-hostile Downloadables described at column 4, lines 29-33 of *Touboul* with the "pre-set list of applications permitted to run on the workstation..." recited in

independent Claim 27. *Id.* The Examiner also equates the List Of Operations Deemed Potentially Hostile described in column 5, line 59 to column 6, line 4 of *Touboul* with the “list of one or more computer resources on the workstation that are not accessible to unspecified applications.” *Id.* The List Of Operations Deemed Potentially Hostile described in *Touboul* is a list of operations that a code scanner 325 may search for when decomposing code of a specific Downloadable to determine if the specific Downloadable is potentially hostile. However, the List Of Operations described by *Touboul* is not a list of one or more computer resources on a workstation that are not accessible to unspecified applications as recited in Claim 27. Further, the List Of Operations described by *Touboul* is not used to determine whether a computer resource requested by an unspecified application is on a list of one or more computer resources that are not accessible to unspecified applications. Accordingly, Applicants submit that the above-listed limitations of independent Claim 27 are not disclosed, taught, or suggested by *Touboul*.

Applicants presented the above arguments in the previous Response mailed August 2, 2007 (the “Previous Response”). In the Final Office Action, the Examiner cites to a new portion of *Touboul*, particularly column 6, lines 13-23. The newly-cited portion of *Touboul* states:

The ACL comparator 330 receives the Downloadable, the corresponding DSP data and the security policy 305 from the code scanner 325, and compares the DSP data against the security policy 305. That is, the ACL comparator 330 compares the DSP data of the received Downloadable against the access control lists 410 in the received security policy 305. The access control list 410 contains criteria indicating whether to pass or fail the Downloadable. For example, an access control list may indicate that the Downloadable fails if the DSP data includes a WRITE command to a system file. The ACL comparator 330 sends its results to the logical engine 333.

Among the arguments raised by Applicants in the Previous Response were the following two arguments. First, Applicants argued that The List Of Operations Deemed Potentially Hostile in *Touboul* is a list of operations that a code scanner 325 may search for when decomposing code of a specific Downloadable to determine if the specific Downloadable is potentially hostile, and that the List Of Operations described by *Touboul* cannot be equated with a list of one or more computer resources on a workstation that are not

accessible to unspecified applications as recited in Claim 27. Applicants still do not see where in the newly-cited portion of *Touboul* that the List of Operations Deemed Potentially Hostile is or includes “a list of one or more computer resources on a workstation that are not accessible to unspecified applications,” as recited in Claim 27. Second, Applicants argued that the List Of Operations described by *Touboul* is not used to determine whether a computer resource requested by an unspecified application is on a list of one or more computer resources that are not accessible to unspecified applications. Rather, the cited portion appears to disclose determining whether potential operations that may be determined from the DSP data of the Downloadable are on a List of Operations Deemed Potentially Hostile. Accordingly, Applicants maintain that the above-listed limitations of independent Claim 27 are not disclosed, taught, or suggested by *Touboul*.

Additionally, it does not appear to Applicants that *Hayman* makes up for at least the above-discussed deficiencies of *Touboul*. *Hayman* discloses a security system for a computer system that imposes limitations on who has access to the computer system and to exactly what operations and data. *Hayman* further discloses breaking up computer functions into required privileges and assigning different privileges to each user depending on the particular job which that user is to do the computer system. Thus, *Hayman* describes a system that determines the permissibility of accessing user-requested functions on a user-by-user basis. Applicants submit that *Hayman* contains no disclosure, teaching, or suggestion of the aforementioned features of independent Claim 27.

For at least these reasons, Applicants respectfully request reconsideration and allowance of independent Claim 27 and its dependent claims. For at least certain analogous reasons, Applicants respectfully request reconsideration and allowance of independent Claims 42 and 57 and their dependent claims.

B. The Separately-Rejected Dependent Claims are Allowable

Claims 33, 48, and 63 are rejected under 35 U.S.C. § 103(a) as being unpatentable over *Touboul* and *Hayman* in view of U.S. Patent 5,987,523 to Hind et al. (“*Hind*”). Claims 33, 48, and 63 are dependent upon independent Claims 27, 42, and 57, respectively.

Dependent Claims 33, 48, and 63 depend from independent Claims 27, 42, and 57, respectively, which Applicants have shown above to be allowable over the proposed *Touboul-Hayman* combination. The Examiner does not allege that *Hind* makes up for the above-discussed deficiencies of the proposed *Touboul-Hayman* combination. Thus, dependent Claims 33, 48, and 63 are allowable at least because they depend from allowable independent claims. Additionally, dependent Claims 33, 48, and 63 recite further patentable distinctions over the proposed *Touboul-Hayman-Hind* combination. To avoid burdening the record and in view of the clear allowability of independent Claims 27, 42, and 57, Applicants do not specifically discuss these distinctions in this Response. However, Applicants reserve the right to discuss these distinctions in a future Response or on Appeal, if appropriate. Moreover, Applicants do not admit that the proposed *Touboul-Hayman-Hind* combination is possible or that the Examiner has provided an adequate reason for combining or modifying the references.

For at least these reasons, Applicants respectfully request reconsideration and allowance of dependent Claims 33, 48, and 63.

II. No Waiver

All of Applicants' arguments and amendments are without prejudice or disclaimer. Additionally, Applicants have merely discussed example distinctions from the references cited by the Examiner. Other distinctions may exist, and Applicants reserve the right to discuss these additional distinctions in a later Response or on Appeal, if appropriate. By not responding to additional statements made by the Examiner, Applicants do not acquiesce to the Examiner's additional statements. The example distinctions discussed by the Applicants are sufficient to overcome the Examiner's rejections.

Conclusion

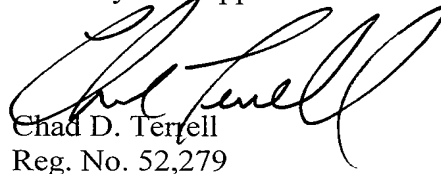
Applicants have made an earnest attempt to place this case in condition for allowance. For at least the foregoing reasons, Applicants respectfully request full allowance of all pending claims.

If the Examiner feels that a telephone conference would advance prosecution of this application in any manner, the Examiner is invited to contact Chad D Terrell, Attorney for Applicants, at the Examiner's convenience at (214) 953-6813.

Although Applicants believe no fees are due, the Commissioner is hereby authorized to charge any necessary fees or credit any overpayments to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,

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